

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BARCO, INC. and BARCO NV,

Plaintiffs,

v.

YEALINK (USA) NETWORK
TECHNOLOGY CO., LTD., and
YEALINK NETWORK
TECHNOLOGY CO., LTD.

Defendants.

Case No. 2:23-CV-00521-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF ERIK J. HALVERSON IN SUPPORT OF OPPOSITION TO
DEFENDANTS' *DAUBERT* MOTION TO STRIKE OPINIONS OF DR. BROGIOLI**

I, Erik J. Halverson, hereby declare as follows:

1. I am a partner at the law firm of K&L Gates LLP and counsel for Plaintiffs Barco, Inc. and Barco NV (collectively, "Plaintiffs"). I have personal knowledge of the facts set forth in this Declaration and if called upon as a witness, I could and would testify to such facts under oath.

2. Attached as **Exhibit A** are true and correct excerpts from the June 10, 2025 deposition of Michael C. Brogioli, Ph.D.

3. Attached as **Exhibit B** are true and correct excerpts from the April 13, 2025 deposition of Dunxiong Cai.

4. Attached as **Exhibit C** is a true and correct copy of Yealink's firmware update status webpage, produced by Plaintiffs in this case with bates number BARCO_0067469.

5. Attached as **Exhibit D** are true and correct excerpts from the April 25, 2025 deposition of Erwin Six.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 1, 2025 in San Francisco, CA.

/s/ Erik J. Halverson
Erik J. Halverson